

## The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHAMBER OF COMMERCE OF THE  
UNITED STATES OF AMERICA; and  
RASIER, LLC

**Plaintiffs,**

CITY OF SEATTLE; SEATTLE  
DEPARTMENT OF FINANCE AND  
ADMINISTRATIVE SERVICES; and FRED  
PODESTA, in his official capacity as Director,  
Finance and Administrative Services, City of  
Seattle.

### Defendants.

No. 17-cv-00370-RSL

**JOINT MOTION FOR  
EXTENSION OF TIME TO FILE  
NOTICE REGARDING  
POSSESSION, CUSTODY, OR  
CONTROL OF DOCUMENTS**

**NOTED ON MOTION  
CALENDAR:  
MARCH 20, 2020**

In a joint submission regarding discovery, Defendant City of Seattle sought an order from this Court compelling Plaintiff Chamber of Commerce to produce documents belonging to its members, including Lyft, Inc., and Eastside for Hire. (Dkt. 113.) The Chamber responded that it has no obligation to do so because it lacks possession, custody, or control of its members' documents. In a March 10 ruling, this Court ordered the Chamber to "notify the Court whether it has the power to obtain and produce the documents requested by the City of Seattle in its First Set of Requests for Production," given the Chamber's "relationship with its members and whatever authorization gives it the right to pursue this litigation." (Dkt. 116 at 4-5.)

JOINT MOTION FOR EXTENSION OF TIME TO FILE NOTICE REGARDING  
POSSESSION, CUSTODY (17-cv-00370-RSL) - 1

4844-6943-1479v.1 0096932-000036

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The Chamber, Rasier, LLC, and the City of Seattle hereby jointly move for a 14-day extension of time for the Chamber to file the discovery notice ordered in this Court's March 10 ruling. (Dkt. 116). The notice is currently due Tuesday, March 24, 2010. The parties request an extension to and including April 7, 2020. The additional time will maintain the current status quo while the parties discuss how the litigation should proceed going forward. The parties also request additional time due to the law-office closures and court closures required by the COVID-19 pandemic. For these reasons, good cause exists for a 14-day extension of time.

DATED this 20th day of March, 2020.

Respectfully submitted,

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POSSESSION, CUSTODY (17-cv-00370-RSL) - 2

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JOINT MOTION FOR EXTENSION OF TIME TO FILE NOTICE REGARDING  
POSSESSION, CUSTODY (17-cv-00370-RSL) - 3  
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